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September 28, 2011

The Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: United States v. Theodore Raines, 11-CR-641(KAM)

Your Honor:

Please be advised that I represent Nayroby Casado, a material witness in the above noted case. Miss Casado has been in custody on the material witness warrant since June 22, 2011. *See* Docket M-11-569. I am now informed that Mr. Raines was arraigned yesterday on the above noted indictment. In the interest of securing Miss Casado's prompt release from custody, I move on her behalf for an order, pursuant to 18 U.S.C. § 3144, such that the attorneys for Mr. Raines and the government shall conduct a prompt deposition of Miss Casado no later than October 14, 2011.

Thank you for your attention. Please advise.

Respectfully submitted,



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cc: Clerk of the court (by ECF)
Tyler Smith, Esq., AUSA
Peter Quijano, Esq. (By fax: 212-686-8690)
Nayroby Casado